

Lindsey H. Hughes, OSB #833857
lhughes@keatingjones.com
Keating Jones Hughes PC
200 SW Market St., Suite 900
Portland, OR 97201-5730
Phone: (503) 222-9955
Fax: (503) 796-0699
Of Attorneys for Defendants Letty Owings Center
and Central City Concern

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

NICOLE MORETTI, as Personal
Representative of the Estate of SAYLOR
MORETTI, deceased,

Plaintiff,

v.

LETTY OWINGS CENTER, CENTRAL
CITY CONCERN and the UNITED
STATES acting through the DEPARTMENT
OF HEALTH and HUMAN SERVICES,

Defendants.

Case No. 3:21-cv-1525

**DEFENDANTS' UNOPPOSED JOINT
MOTION TO EXTEND ANSWER DATE**

By Letty Owings Center and Central City
Concern

CERTIFICATE OF COMPLIANCE WITH LR 7-1

Counsel for Defendants Letty Owings Center and Central City Concern, ("defendants")
has conferred with Plaintiff's counsel, Karl G. Anuta, and counsel for all other named parties.

This motion is unopposed and jointly presented by all defendants.

MOTION

Defendants Letty Owings Center and Central City Concern Recovery Center move the
court on behalf of all defendants for an order extending the deadline for responding to the

**DEFENDANTS' UNOPPOSED JOINT MOTION TO
EXTEND ANSWER DATE - Page 1**

Doc No. 1807029

KEATING JONES HUGHES P.C.
200 SW Market St., Suite 900
Portland, Oregon 97201-5730
(503) 222-9955

Amended Complaint by 30 days. Defendant United States of America has recently concluded its analysis whether it is a proper defendant and whether FSHCAA applies to defendants Letty Owings Center and Central City Concern. The United States has recently advised defendants Letty Owings Center and Central City Concern of its determination of these complex issues. Now that defendants Letty Owings Center and Central City Concern have that information, they are finally able to formulate the response needed as a first appearance to ensure their position concerning application of FSHCAA and its protections is heard.

Defendants' responses to the amended complaint are currently due on May 23, 2022. The proposed appearance deadline is June 22, 2022. Other scheduling deadlines should be reset after responses are filed and a Rule 16(b) conference is held. This request is made in good faith and not for the purposes of delay.

CONCLUSION

Defendants request that their responses to the amended complaint be due on June 22, 2022.

DATED this 19th day of May, 2022.

Respectfully submitted,

KEATING JONES HUGHES, P.C.

s/Lindsey H. Hughes

Lindsey H. Hughes, OSB No. 833857
503-222-9955

Attorneys for Defendants Letty Owings Center and Central
City Concern

s/Michael Jeter

Michael Jeter
Assistant U.S. Attorney
Attorneys for Defendant United States of America

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing **DEFENDANTS' UNOPPOSED JOINT MOTION TO EXTEND ANSWER DATE** on the following:

Karl Anuta
Law Office of Karl G. Anuta, P.C.
735 SW First Ave, 2nd Floor
Portland, Oregon 97204
Phone: (503) 827-0320
Email: kga@integra.net
Of Attorneys for Plaintiff

Scott Erik Asphaug
U.S. Attorney
District of Oregon
Michael Jeter
Assistant U.S. Attorney
1000 SW Third Avenue, Suite 600
Portland, Oregon 97204-2902
Phone: (503) 727-1025
Email: michael.jeter@usdoj.gov
Attorneys for Defendant United States of America

by electronically mailed notice from the court to above attorneys on said day.

DATED this 19th day of May, 2022.

KEATING JONES HUGHES, P.C.

s/Lindsey H. Hughes

Lindsey H. Hughes, OSB No. 833857
lhughes@keatingjones.com, FAX 503-796-0699
Of Attorneys for Defendants Letty Owings Center and
Central City Concern

Trial Attorney: Lindsey H. Hughes, OSB No. 833857